

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL FOUR)

Docket No. RM2021-7

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL FOUR
(August 30, 2021)

Order No. 5945 (July 27, 2021) established the procedural schedule in this proceeding and, while setting the date for initial comments at August 23, made no provision for reply comments. Pursuant to Order No. 5945, only one set of initial comments was filed on August 23, and those were submitted by the Public Representative (PR). The Public Representative agrees that Proposal Four overall would be an improvement, but alleges that certain aspects require clarification and further support. PR Comments at 3. The Postal Service requests leave to file reply comments addressing matters raised by the PR Comments.

Acceptance of those reply comments would enhance the Commission's ability to evaluate the claims advanced in the PR Comments, and thus create a more complete record for consideration of the Proposal. The Postal Service would otherwise have no opportunity to respond to those comments, or to address the alleged information deficiencies. The Postal Service reply comments are proffered in a separate pleading submitted concurrently.

Wherefore, the Postal Service respectfully requests leave to file reply comments

responding to the initial comments filed in this proceeding by the Public Representative.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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